

# Guidance on Adhesives & Toys

Version: March 2016

Published by the Technische Kommission Haushalt-, Hobby-, Büroklebstoffe (TKHHB) (Technical Commission on household, hobby and office adhesives) of the Industrieverband Klebstoffe e.V., (German Adhesives Association), Düsseldorf

## Contents

Introduction .....	2
I. Implementation of the Toy Safety Directive with respect to Adhesives .....	2
1. Provisions of relevance to the adhesives industry .....	3
2. Adhesives as constituents of toys .....	3
3. Adhesives as toys .....	3
3.1. General requirements on toys, their composition and packaging .....	4
3.1.1. Essential safety requirements according to the Toy Safety Directive .....	4
3.1.2. Particular risks .....	4
<b>Physical properties (see Annex II, TSD) .....</b>	<b>4</b>
3.1.3. Documentation .....	6
3.1.4. Marking .....	7
3.2. Requirements for adhesives as toys .....	7
3.2.1. Adhesive formulation .....	7
3.2.3. Packaging .....	7
3.2.3. Warnings .....	8
3.2.4. Documentation .....	8
3.2.5. Example of a self-assessment for an adhesive .....	8
II. Legal sources .....	11

## Introduction

Adhesives are in most cases not classed as toys, so that they normally do not fall under the provisions of the Toy Safety Directive. However, they can be used to manufacture toys and can also be a toy in themselves. When an adhesive has been specifically described as intended for use as a toy or for handicraft purposes, it then will fall under the provisions of the Toys Directive. It is also possible that an adhesives manufacturer may also implicitly classify his product as a toy through its design (e.g. as a small figure or as part of a handicrafts kit). Consequently, every adhesives manufacturer must take note of the relevant regulations and, if affected by them, take the necessary measures.

The purpose of this guidance document is to provide practical assistance to enterprises in the adhesives industry, enabling them to easily identify and implement the requirements of EU Directive 2009/48/EC<sup>(1)</sup> on the safety of toys (Toy Safety Directive (TSD)).

This latest revision of Guideline has been updated to reflect the provisions of the revised Toy Safety Directive, which has now come into force.

In addition to guidance on identifying concrete cases where there is a legal obligation to comply with the directive, the guideline also describes the steps an enterprise must take in order to ensure compliance with the TSD.

To begin with, here is a short summary of the relevant aspects to be noted under the new TSD.

- The operators involved in the supply and distribution chain for a toy (referred to in the directive as 'economic operators') and their obligations are defined and distinctly differentiated. Manufacturers, importers and distributors are all economic operators. Specific reference is made to the obligation of economic operators to comply with the requirements of the Directive.
- The main safety requirements, particularly in regard to chemicals, have been updated and expanded to reflect developments in scientific knowledge. In addition to certain chemical elements, the directive now covers substances classified as carcinogenic, mutagenic or toxic for reproduction (CMR) and allergenic fragrances.
- The rules for affixing the CE marking are stated and the conditions for CE marking of toys have been adapted.
- If a toy can present a danger, this must be indicated by an appropriate warning. The warning must be preceded by the word "Warning".
- New categories of toys, particularly those requiring specific warnings, have been included.

The current TSD came into full force on June 20<sup>th</sup>, 2011, and compliance with its provisions has been mandatory from that date. The only exception was the essential safety requirements relating to chemicals, which came into force later, on July 20<sup>th</sup>, 2013.

## I. Implementation of the Toy Safety Directive with respect to Adhesives

Toys, i.e. products designed or obviously intended for use as playthings by children under 14 years of age must be safe to use and may not endanger the health of users during their normal useful life.

The safety requirements are based on the provisions of the Toy Safety Directive 2009/48/EC<sup>(1)</sup>.

In Germany, this directive has been implemented since June 20<sup>th</sup>, 2011 through the Zweite Verordnung zum Geräte- und Produktsicherheitsgesetz (Verordnung über die Sicherheit von Spielzeug; 2. GPSGV<sup>(2)</sup>) [Second Ordinance to the Equipment and Product Safety Act (Ordinance on the Safety of Toys - 2nd GPSGV)].

## 1. Provisions of relevance to the adhesives industry

The Toy Safety Directive applies to adhesives when

- they constitute a part of the toy itself (e.g. a laminated or adhesive bonded wooden toy), and
- they themselves are intended as toys (e.g. as components of model-building kits or designed specifically as and/or described as an adhesive for use in handicrafts).

Depending on the type of toy and its conceivable uses the following regulatory documents are consulted when assessing conformity.

- Toy Safety Directive 2009/48/EC<sup>1)</sup> in general, and especially:
  - Part III: “Chemical Properties” of Annex II: “Particular Safety Requirements”.
- The EN 71 “Safety of Toys” family of standards
  - Part 3: “Migration of certain elements” (EN 71-3:2013+A1:2014)
  - Part 9: “Organic Chemical Compounds – Requirements” (EN 71-9:2005 + A1:2007)
  - Part 1: “Mechanical and physical properties” (EN 71-1:2014)
- Annex XVII to the REACH Regulation<sup>3)</sup> (Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles)
- EC Regulation on classification, labelling and packaging of substances and mixtures<sup>4)</sup>
- Cosmetics Regulation<sup>5)</sup>
- Food additives regulation<sup>6)</sup>
- ISO 11540<sup>7)</sup> standard, “Caps for writing and marking instruments for use by children up to 14 years of age – Safety requirements” may also be of relevance in some cases.

## 2. Adhesives as constituents of toys

The responsibility for ensuring the conformity of a toy lies with the manufacturer of the toy or entity placing it on the market. Conformity must be assessed on the finished product.

The manufacturer/supplier of adhesives used to manufacture the toy can provide information to the toy manufacturer on the substances contained in and the chemical composition of the adhesive, if this information is relevant to the conformity of the toy.

These substances include:

- the elements stated in the standard EN 71, Part 3
- the substances listed in tables 2A to 2I of the standard EN 71 Part 9. (The tables selected will depend on the materials of which the toy is made)
- the substances considered in Part III of Annex II of the Toy Safety Directive:
  - Point 3: substances that are classified as carcinogenic, mutagenic or toxic for reproduction (CMR) of category 1A, 1B or 2 under the CLP Regulation (EC) No 1272/2008<sup>4)</sup>
  - Point 11: prohibited and restricted fragrances
  - Point 13: migration limits
- substances whose use in toys or baby items is restricted or prohibited according to Annex XVII to the REACH regulation<sup>3)</sup> (currently, entries no. 20, 51 and 52).

## 3. Adhesives as toys

If the adhesive is to be used directly as a toy or as part of a model-building kit, it must comply with the conformity requirements of the Toy Safety Directive.

Since, in this case, it is the manufacturer who is responsible for compliance with the safety requirements of the Toy Safety Directive<sup>1)</sup>, he must not only comply with the general safety requirements of the Toy Safety Directive but also carry out a conformity assessment procedure. By affixing the CE marking to the packaging of the adhesive, the manufacturer declares compliance with the safety requirements and that the corresponding conformity assessment procedure has been carried out.

In performing the conformity assessment procedure (as set out in Decision No 768/2008/EC<sup>8)</sup>), the manufacturer must demonstrate that the toy is safe to use. In Article 19, the TSD<sup>1)</sup> contains a provision that this procedure shall be as set out in Module A of the above Decision (internal production control procedure) where harmonized standards exist. This is so in the case of adhesives.

These procedures are carried out internally by the manufacturer. In addition to affixing the CE marking to the product and issuing the CE conformity declaration, the following tasks must be performed during a conformity assessment procedure:

- drawing up of technical documentation containing all relevant data or details of the

means used by the manufacturer to ensure that the toy is safe

- ensuring that the technical documentation is consistent with the properties of the product as a result of the production process, the monitoring procedures in place, and product inspections
- carrying out product examinations to assess compliance with the safety requirements of the Toy Safety Directive.

The manufacturer may have the product examinations performed by an appropriately accredited in-house body or by an external notified body of his choice.

**Harmonized standard:** Harmonized standards are standards prepared by European standardization organizations (CEN; CENELEC; ETSI) mandated to do so by the European Commission. It is presumed that in fulfilling a harmonized standard which covers all safety aspects, the product will comply with the essential safety requirements. Other hazards may be presented by toys which are not covered by standards. These hazards can be identified through the safety assessment. They are a main item of the conformity assessment procedure of the European single market. Harmonized standards are published in the Official Journal of the European Union. Standards which have been harmonized in line with the Toy Safety Directive 2009/48/EC<sup>1)</sup> are (as at November 2015)<sup>1)</sup>:

- Part 1: Mechanical and physical properties EN 71-1:2014
- Part 2: Flammability EN 71-2:2011+A1:2014
- Part 3: Migration of certain elements EN 71-3:2013+A1:2014
- Part 4: Experimental sets for chemistry and related activities EN 71-4:2013
- Part 5: Chemical toys (sets) other than experimental sets EN 71-5:2015
- Part 7: Finger paints – Requirements and test methods EN 71-7:2014
- Part 8: Swings, slides and similar activity toys for indoor and outdoor family domestic use EN 71-8:2011
- Part 12: N-Nitrosamines and N-Nitrosatable Substances in Toys EN 71-12:2013
- Part 13: Olfactory board games, cosmetic kits and gustative games EN 71-13:2014
- Part 14: Trampolines for domestic use EN 71-14:2014

<sup>1)</sup> An up-to-date list of standards can be found at: [http://ec.europa.eu/growth/single-market/european-standards/harmonised-standards/toys/index\\_en.htm](http://ec.europa.eu/growth/single-market/european-standards/harmonised-standards/toys/index_en.htm)

Some standards issued by CENELEC (European Committee for Electrotechnical Standardization) have also been harmonised, but are disregarded here since they are not relevant to adhesives.



(Fig. 1)

**The CE marking** (see Fig. 1) is to be **affixed before placing the toy on the market**. The updated Directive also sets out the requirements regarding legibility and location of the CE marking (see 3.1.4.).

### 3.1. General requirements on toys, their composition and packaging

#### 3.1.1. Essential safety requirements according to the Toy Safety Directive

Toys shall not jeopardise the safety or health of users or third parties when they are used as intended or in a foreseeable way, bearing in mind the behaviour of children.

Hazards can be attributable to the design, manufacture or composition of the toy or related to its use. The risk shall not be unreasonable, particularly in the case of toys intended for children under 36 months. It may be necessary to specify a minimum age for use or use only under the supervision of an adult and to indicate this by warnings on the toy, packaging or instructions for use accompanying the toy. Information relevant to the decision whether to purchase a toy, such as specifying the minimum or maximum age of the user as well as any appropriate warnings, must be indicated on the packaging or made known to the consumer in a way that is clearly recognizable before a purchase is made (this applies also in the case of online purchases).

#### 3.1.2. Particular risks

##### **Physical properties (see Annex II, TSD)**

- An unreasonable risk of physical injury through distortion or breaking must be avoided. Also to be avoided are sharp edges, protrusions or corners.
- Toys for infants, including any detachable parts, and their packaging must be designed so that they cannot be inhaled or swallowed by children under 36 months or cause strangulation or asphyxiation.
- Further particular safety risks apply in the case of aquatic toys, tricycles, roller skates, swings, or similar.

## Flammability

Toys must not constitute a dangerous flammable element in the child's environment.

Toys and, in particular, chemical games and toys, must not contain as such substances or mixtures:

- which, when mixed together, may explode through chemical reaction or through heating;
- which may explode when mixed with oxidizing (fire-intensifying) substances; or
- which contain volatile components which are flammable in air and liable to form a flammable or explosive vapour/air mixture.

## Chemical properties

Toys shall be designed and manufactured in such a way that there are no risks of adverse effects on human health due to exposure to the chemical substances or mixtures of which the toys are composed or which they contain.

Toys must therefore also comply with the general legislation on chemicals. This involves considering the CLP Regulation on the classification, labelling and packaging of substances and mixtures (EC) No 1272/2008<sup>7)</sup>, and the REACH Regulation (EC) No 1907/2006<sup>8)</sup>.

Risks which may be caused by chemical substances in toys and the use of dangerous substances, in particular those classified as carcinogenic, mutagenic or toxic for reproduction (CMR substances), allergenic fragrances and certain metals, must be minimized.

CMR substances that fall under Category 1A and 1B (CLP Regulation<sup>4)</sup>) shall not – without exception – be used in toys or components of toys.

CMR substances that fall under Category 2 (CLP Regulation<sup>4)</sup>) may be used in toys or parts of toys, provided that:

- they are contained in concentrations smaller than the classification limits, and
- they are inaccessible to children.

Conditions for an exceptional authorization for use of CMR substances that cannot be inhaled are described.

Allergenic fragrances are listed in the Annex with indication of whether their use is prohibited or subject to mandatory labelling requirements.

The list of certain chemical elements has been supplemented by substance groups. The migration limit values have been established for three different categories of toy materials according to

their state (solid and dry / liquid / scraped-off). In addition to the previously existing migration limits for antimony, arsenic, barium, cadmium, chromium, lead, mercury and selenium, migration limits have now been laid down for the substances boron, chromium (III), chromium (VI), cobalt, copper, manganese, nickel, strontium, tin, organotin compounds, and zinc.

Element	mg/kg in dry, brittle, powder-like or pliable toy material	mg/kg in liquid or sticky toy material	mg/kg in scraped- off toy material
Aluminium	5625	1406	70000
Antimony	45	11.3	560
Arsenic	3.8	0.9	47
Barium	4500	1125	56000
Boron	1200	300	15000
Cadmium	1.3	0.3	17
Chromium (III)	37.5	9.4	460
Chromium (VI)	0.02	0.005	0.2
Cobalt	10.5	2.6	130
Copper	622.5	156	7700
Lead	13.5	3.4	160
Manganese	1200	300	15000
Mercury	7.5	1.9	94
Nickel	75	18.8	930
Selenium	37.5	9.4	460
Strontium	4500	1125	56000
Tin	15000	3750	180000
Zinc	3750	938	46000
Organotin compounds	0.9	0.2	12

The relevant standard EN 71-3:2013+A1:2014 "Safety of Toys: Migration of certain elements" has already been adapted to include the new substances.

Toys shall not contain any dangerous substances or mixtures in concentrations which are not safe for use, e.g. in the event of swallowing, inhalation or contact with the skin, mucous membranes or the eyes. Further information on the use or restrictions on the use of input materials can be found in:

- Annex XVII to the REACH Regulation<sup>3)</sup> (Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles)
- Parts 4, 5 and 7 of the standard EN 71
- Parts 9, 10 and 11 of the standard EN 71 (these were not harmonized under the "old" toy

directive 88/378/EEC<sup>9)</sup>, and are therefore voluntary technical standards)

- the Cosmetics Regulation<sup>5)</sup>, where appropriate,
- and the Food Additives Regulation<sup>6)</sup>

However, if a limited number of dangerous substances or mixtures is essential for proper functioning of the toy, specified maximum content levels shall not be exceeded. The toy must then be labelled with the appropriate danger warnings. The requirements for experimental sets for chemistry are set out in EN 71-4:2013+A1:2014, and those for making models or scale models can be found in EN 71-5:2015.

#### Other special properties:

The Toy Safety Directive also considers other risks such as those relative to electrical toys, hygiene or radioactivity.

Electrical risks are not relevant to adhesives.

Hygiene: Adhesives must be designed and manufactured in such a way as to meet hygiene and cleanliness requirements in order to avoid any risk of infection, sickness or contamination. This is particularly important in the case of water-based adhesives which could be contaminated by germs.

Radioactivity: Radioactive risks are, in principle, not relevant in the case of adhesives, although events such as Fukushima or radioactive steel from Asia may have an influence on the supply chain.

#### Current structure of the EN 71 standard

The European standard EN 71, Safety of Toys, currently comprises 13 parts:

- Part 1: Mechanical and physical properties  
EN 71-1:2014
- Part 2: Flammability EN 71-2:2011+A1:2014
- Part 3: Migration of certain elements  
EN 71-3:2013+A1:2014
- Part 4: Experimental sets for chemistry and related activities EN 71-4:2013
- Part 5: Chemical toys (sets) other than experimental sets  
EN 71-5:2015
- Part 6: repealed, integrated in part 1
- Part 7: Finger paints – Requirements and test methods EN 71-7:2014
- Part 8: Swings, slides and similar activity toys for indoor and outdoor family domestic use  
EN 71-8:2011
- Part 9: Organic chemical compounds. Requirements  
EN 71-9:2005 + A1:2007
- Part 10: Organic chemical compounds. Sample preparation and extraction EN 71-10:2005
- Part 11: Organic chemical compounds. Methods of analysis  
EN 71-11:2005
- Part 12: N-Nitrosamines and N-Nitrosatable Substances in Toys EN 71-12:2013
- Part 13: Olfactory board games, cosmetic kits and gustative games EN 71-13:2014
- Part 14: Trampolines for domestic use EN 71-14:2014

Almost all parts of this standard have been harmonized in relation to the Toy Safety Directive 2009/48/EC<sup>1)</sup> and therefore have legal effect.

Parts 9, 10 and 11 have not been harmonized and are technical standards.

#### 3.1.3. Documentation

The technical documentation consists of the following elements:

- a) a detailed description of the design and manufacture, including a list of components and materials used in the toy as well as the safety data sheets on chemicals used, to be obtained from the chemical suppliers;
- b) the safety assessment(s), in which the manufacturer shall carry out an analysis of the chemical, physical, mechanical, electrical, flammability, hygiene and radioactivity hazards that the toy may present, as well as

an assessment of the potential exposure to such hazards. This must be done before placing the toy on the market.

- c) a description of the conformity assessment procedure followed;
- d) a copy of the EC declaration of conformity;
- e) the addresses of the places of manufacture and storage;
- f) copies of the documents the manufacturer has submitted to a notified body, if involved;
- g) test reports and description of the means whereby the manufacturer ensured conformity of production with the harmonized standards, if the manufacturer followed the internal production control procedure (as defined in Decision No 768/2008/EC<sup>8</sup>);

The technical documentation must be kept available for ten years after placing the toy on the market.

Market surveillance authorities can issue a reasoned request for a manufacturer to provide the relevant parts of the technical documentation. In such a case the manufacturer must provide a translation into the language of the Member State of the requesting authority within a deadline of generally 30 days.

#### 3.1.4. Marking

On the toy, in the accompanying documents or on the packaging, the following must be affixed visibly, legibly and indelibly:

- CE marking: graphic symbol, size: at least 5 mm (if made smaller or larger, the proportions of the CE marking must be retained in all cases) The CE marking is illustrated in Figure 1).
- The (company) name and address of the entity placing the toy on the market (manufacturer, importer) in the EU (the postal address of a central office where the manufacturer can be contacted is to be indicated).
- Warnings, restriction and instructions for use must be composed in German (or in the relevant national languages) according to the manufacturer's own classification or EC-type examination. The manufacturer shall mark the warnings in a clearly visible, easily legible and understandable and accurate manner on the toy, on an affixed label or on the packaging and, if appropriate, on the instructions for use which accompany the toy. The warnings must be preceded by the word "Warning".

For small toys, marking on the packaging, label or accompanying instructions is also possible. For

small toys sold without packaging, the warning must be affixed directly to the toy.

### 3.2. Requirements for adhesives as toys

Before placing the toy on the market, the manufacturer must carry out a safety assessment to analyse the chemical, physical, mechanical, electrical, flammability, hygiene and radioactivity hazards that the toy may present (see section 3.1.2), as well as an assessment of the potential exposure to such hazards.

The following aspects are evaluated in the safety assessment:

#### 3.2.1. Adhesive formulation

The details of the adhesive formulation must be known in order to carry out this assessment. If all the ingredients are listed, for example, in EN 71 Part 5 for a corresponding product category and if their concentrations lie within the migration limits in Annex II of the Toy Safety Directive 2009/48/EC<sup>1</sup>, it can be presumed that the essential safety requirements are fulfilled.

The Cosmetics Regulation and the Food Additives Regulation may also be consulted for assessment.

In addition to parts 3 and 5 of EN 71, Part 9 is also of relevance when evaluating adhesives.

**If the substances are not listed in EN 71, Articles 19(3) and 20 of the TSD<sup>1</sup> make provision for an EC-type examination to be carried out by a notified body<sup>2</sup> in accordance with Module B (EC-type examination) or C (conformity with the design type based on an internal production control procedure) of Decision No 768/2008/EC<sup>8</sup>.**

#### 3.2.3. Packaging

As with the formulation, all constituents of the product packaging must be known.

The product packaging must be assessed according to a variety of EN 71 criteria:

- Mechanical safety (Part 1), e.g. risk of injury due to sharp edges, small parts that can be swallowed, risk of suffocation or strangulation due to plastic sheeting or strings, etc.
- Migration of certain elements (Part 3): the migration limits for the packaging, including printing or labels, must be complied with.

<sup>2</sup> An up-to-date list of notified bodies can be found at: <http://www.dakks.de/content/akkreditierte-stellen-dakks>. In the full text search, enter the term "Spielzeug" [toys].

- Chemical safety (chemical requirements of the Toy Safety Directive, Annex XVII of the REACH Regulation<sup>3)</sup>): e.g. ban on phthalates, azo colorants (dyes), allergenic disperse dyes, organic tin compounds, etc.

If appropriate, the restrictions regarding the package size set out in EN 71-5 must be considered.

Regarding caps for writing, painting or marking pens, in the UK the requirements of ISO 11540<sup>7)</sup> must also be complied with.

Not considered are pure secondary packagings which are not part of the toy and are discarded immediately or the packagings of adhesives used in the production of toys. In these cases only the adhesive itself is subject to the requirements of the Toy Safety Directive.

### 3.2.3. Warnings

Without prejudice to the fulfilment of other provisions regarding the classification, packaging and labelling of dangerous substances and mixtures, toys must bear additional warnings. If a hazard exists, this must be indicated by a specific warning. Warnings must be preceded by the word “**Warning**” or “**Warnings**”.

This includes, for example

- appropriate age limit (depending on the type of adhesive, as specified in EN71-5. Glue sticks are not suitable for children below 3 years. The age-warning symbol given in EN 71-1, No. 7.2 (and Part B of Annex V to TSD) can be used. Water based adhesives are not suitable for children below 5 years. The indication “Not suitable for children under five years” has to be used on the label, the age warning symbol cannot be used.),
- a warning regarding small parts that can be swallowed (if these are contained in the packaging and if the product is available for children older than 3 years),
- hygiene warnings (washing hands, rinsing eyes),
- the warning: “For use under adult supervision.”
- and for all water-based adhesives, the preservative used must be indicated in clear text.

The texts of the warnings can be found in 21 European languages in the Technical Report CEN/TR 15071<sup>10)</sup>. An overview of the warnings can also be found on the website of the EU Commission.<sup>3)</sup>

<sup>3)</sup> [http://ec.europa.eu/enterprise/sectors/toys/files/tsd-guidance/warnings\\_on\\_toys\\_v1-0\\_en.pdf](http://ec.europa.eu/enterprise/sectors/toys/files/tsd-guidance/warnings_on_toys_v1-0_en.pdf)

The general labelling requirements of the Toy Safety Directive must be observed (see point I, 2.4).

### 3.2.4. Documentation

The required technical documentation is described in section 3.1.3.

### 3.2.5. Example of a self-assessment for an adhesive

#### Formulation

Concentration	Ingredient	Listing in EN 71 Part 5
45 %	Polyvinyl acetate	Sec. 7.2.1 Table 4
5 %	Polyvinyl alcohol	Sec. 7.2.1 Table 4
5 %	Starch	Sec. 7.2.1 Table 5
2 %	Butyl glycolate	Sec. 7.2.1 Table 6
< 0,1 %	Bronopol	Cosmetics Reg. Annex V
Rest	Water	

#### Packaging

##### Printed plastic tube

- No mechanical hazards that could cause injury
- Plastic (PE) and printing inks contain no heavy metals or plasticizers
- (e.g. phthalates) according to supplier certificate (or own analysis)
- Printing inks contain no allergenic or azo dyes: according to supplier certificate (or own analysis)
- Maximum size of the tube in accordance with EN 71-5: 100 ml
- Tube closure can be swallowed, as specified in EN 71-1

**Marking**

- CE marking (minimum size 5 mm)
- Warning! Not suitable for children below 5 years. For use under adult supervision.
- Contains 2-bromo-2-nitropropane-1,3-diol
- Recommendation: If the tube is too small: print the warnings only on the blister pack, but add the following sentence. Keep the packaging.
- Font size at least 1.5 mm

No name plc  
10 Anywhere Street  
40780 Düsseldorf

**EC declaration of conformity****EC DECLARATION OF CONFORMITY**

*No Name GmbH, 10 Anywhere Street, D-40780 Düsseldorf*

declares under its sole responsibility as manufacturer that the product

**FIX Super**  
(Version FS100)



Anmerkung: Die  
Abbildung des  
Produktes **muss**  
farbig sein.

fulfils the requirements of the EU Directive 2009/48/EC on the safety of toys.

The following harmonised standards were applied:

EN 71-1:2014 Safety of toys – Part 1: Mechanical and physical properties

EN 71-3:2013+A1:2014 Safety of toys – Part 3 Migration of certain elements

EN 71-5:2015 Safety of toys – Part 5 Chemical toys (sets) other than experimental sets

Düsseldorf, March 15<sup>th</sup>, 2015

No name plc  
Responsible departments (for example Product Safety)

Signature

## II. Legal sources

1. Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys
2. Zweite Verordnung zum Geräte- und Produktsicherheitsgesetz (Verordnung über die Sicherheit von Spielzeug) [*Second Ordinance to the Equipment and Product Safety Act (Ordinance on the Safety of Toys)*] of 7 July 2011, published in the [German] Federal Gazette BGBl. I pages 1350, 1470
3. Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC
4. Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006
5. Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products.
6. Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives.
7. ISO 11540 – Caps for writing and marking instruments intended for use by children up to 14 years of age -- Safety requirements; 1993-09
8. Decision No 768/2008/EC of the European Parliament and of the Council of 9 July 2008 on a common framework for the marketing of products.
9. Council Directive 88/378/EEC of 3 May 1988 on the approximation of the laws of the Member States concerning the safety of toys, as amended by Council Directive 93/378/EEC of 22 July 1993
10. Technical Report CEN/TR 15071:2005 - Safety of toys – National translations of warnings and instructions for use in EN 71.

The Information and specifications in this briefing note reflect to the best of our knowledge to the current state of technology. They are only intended for information purposes and as a nonbinding guideline. As a result, they cannot be used as a basis for deriving any warranty claims.